

February 17, 2012

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petition for Declaratory Ruling
IB Docket No. 11-109

Dear Chairman Genachowski:

The Ohio Hotel & Lodging Association (OH&LA) would like to provide the following letter regarding LightSquared's proposed national wireless broadband network, which would expand America's wireless broadband capacity, increase competition and choice for millions of American consumers, provide next-generation connectivity to public safety agencies and rural Americans, lower prices, and create jobs.

It is our understanding LightSquared has always followed the FCC's rules as very clearly stated in its Petition for Declaratory Ruling. Rules are rules and the FCC should reaffirm the clarity of these rules and declare that GPS device makers are not protected from incompatible operations in non-GPS allocated bands of spectrum.

As the Commission is aware, America faces a spectrum crunch in the coming years. Smartphones use 24 times as much bandwidth as older cell phones, and mobile data traffic is doubling every 12 months. Within two years, our wireless infrastructure will hit a breaking point unless new capacity comes online – and soon. LightSquared represents the best hope for significant capacity expansion in the near future.

Given the many benefits of this proposed privately financed network, it is distressing that special interests are attempting to game the system for their own benefit, blocking this network from moving forward for no reason other than their own self-interest.

Many GPS device makers have sold GPS devices with a false bill of goods. Without notifying consumers of the interference risks inherent with GPS devices that seek signals outside of the GPS band, many of these manufacturers have designed GPS devices to listen for GPS signals within LightSquared's licensed spectrum. The fact is that the FCC put GPS device makers on notice as early as 2004 that the L-band would be used for terrestrial operations.

As the Commission is also aware, LightSquared has put in place affordable technical solutions exist that mitigate interference. However, rather than pursuing these options and participating in a solution, GPS companies are claiming squatters' rights and are pulling every political lever they can to kill the network before it starts.

LightSquared's proposed network may indeed result in interference with GPS devices, but the origin of interference must be accurately measured and properly attributed given the enormous benefits of this network. If the FCC decides to permanently revoke LightSquared's 2004 authorization, I urge the Commission to assign LightSquared licenses to other suitable spectrum that will enable LightSquared and its partners to commence commercial operations as soon as possible.

Thank you for your consideration of my comments.

Sincerely,



Michael T. Evans
Director of Government Affairs